

In regards to WP Docket number 10-72, I would submit the following comments:

It is, in my opinion and belief, a good idea to preserve the foundational principles of the Amateur Radio Service in keeping with volunteer service. Furthermore, it is not, to my knowledge, a violation of any portion of the Code of Federal Regulations for the American Red Cross and such other disaster relief agencies to seek the volunteer assistance of amateur radio communicators, even though these organizations do employ individuals for monetary gain. Therefore, I would submit that employees of governmental agencies and organizations of like manner do not employ personnel for the sole purpose of radio communications in times of emergency or disaster. Since salary and other pay is based solely on duties performed outside of radio operations, I would conclude that those employees who would communicate in times of emergency or drill would not be doing so for the sake of compensation, but rather, to promote public safety and preserve life and property above and beyond the call of duty of the employee-employer relationship (acting in a volunteer capacity as far as the direct communications are concerned). In limiting these operators and prohibiting communications, we are reducing the effectiveness and timeliness of a response in times of actual disaster. In addition, under the current Commission's rules, these agencies may request a waiver to permit operations during testing and drills. To what effect is this if these same agencies are barred from transmission during an actual emergency due to the lack of a waiver being present? It would be my recommendation to either (a) eliminate the waiver provision altogether and disallow all operations, to include testing and drills, or (b) allow these operators to act in their personal (amateur) and professional (paid) obligations simultaneously as long as the communications are of an emergency or disaster-related capacity and do not promote pecuniary interests (direct profit) on the behalf of an employer. We must cease the political games and stop straddling the fence. Please make a decision in either manner, as stated above and leave the exceptions and waivers out of the equation. These are people's lives we are dealing with in times of emergency!

Respectfully Submitted,

Morris C. Parker, KD4KFR